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February 24, 1993

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FEB 24 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Room 222
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Ms. Searcy:

On behalf of Vector Broadcasting Inc., permittee of Station WEEP-FM, Chateaugay, New York, there is transmitted herewith an original and four copies of its Petition for Rulemaking seeking the substitution in the FM Table of Assignments of Channel 234C2 in lieu of Channel 234A at Chateaugay, New York, and the modification of the construction permit for Station WEEP-FM to specify operation on the higher class channel in accordance with the provisions of Section 1.420(g)(3) of the Commission's rules. It should be noted that a request to change the call sign of Station WEEP-FM to WYUL(FM) is pending before the Commission.

If any additional information is desired in connection with this matter, please contact the undersigned counsel.

Very truly yours,

Brian M. Madden

Brian M. Madden

Enclosure
BMM/tlm

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FEB 24 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Amendment of Section 73.202	)	RM_____
FM Table of Allotments	)	
Radio Broadcast Stations	)	MM Docket _____
	)	
(Chateaugay, New York)	)	

To: The Commission

PETITION FOR RULEMAKING

Vector Broadcasting Inc. (the "Petitioner"), hereby requests that the Commission institute a rulemaking proceeding to amend Section 73.202 of the Commission's Rules (the FM Table of Allotments) as follows:

City	Channel No. Present	Channel No. Proposed
Chateaugay, NY	234A	234C2

As this change will be effected on the same channel now authorized for use by Station WEEP-FM, Chateaugay, New York, the Petitioner requests that the construction permit for the station be modified to specify operation on Channel 234C2, in accordance with the provisions of Section 1.420 (g) (3) of the Commission's rules.

PROPOSAL OF THE PETITIONER

1. On December 23, 1991, Vector Broadcasting Inc. was granted a Construction Permit for construction of a new FM station on Channel 234A at Chateaugay, NY (File No. BPH-900518MN, current call sign WEEP-FM).

2. Attached hereto and included as a part of this proposal as Exhibit A is a computer-generated allocation study for channel 234C2 using the tower site coordinates specified in our Construction Permit. The study indicates that channel 234C2 can be substituted for channel 234A and can be assigned with no domestic shortspacings, and with only minor short-spacings to certain Canadian facilities. Each of these apparent short-spacings would be acceptable and not cause any interference as defined in the U.S./Canada Working Agreement, either through a relocation of our proposed tower site or through limited parameters in the direction of the Canadian allocations.

One is an apparent 12.9 km short-spacing to an allocation for channel 236B at Montreal, Quebec. A second is an apparent 33.8 km short-spacing to CKMF, channel 232C1 at Montreal, Quebec. However, with a site restriction (and relocation of our tower site) or by using a directional antenna from the site coordinates specified in our construction permit, there is no predicted interference from the proposed Chateaugay facility to either channel 236B allocation or the CKMF operation, both located at a central Montreal antenna farm (Exhibit B-1). The third apparent short-spacing is 29.8 km to CIMF, channel 235C1 at Hull, Quebec. Once again, with a site restriction (and relocation of our tower site) or by using a directional antenna from the site coordinates specified in our construction permit, there is no predicted interference from the proposed Chateaugay facility to the CIMF operation (Exhibit B-2).

There are three other apparent shortspacings to unused and unapplied for Canadian allocations (two allocations and one proposal to add). As demonstrated below, these three allocations all appear to be mutually exclusive and only could one ever be utilized. Indeed, there are two allocations for the same community. One is an apparent 68.4 km short-spacing to an unused and unapplied for allocation on channel 234C1 at Trois-Rivieres, Quebec. A second is a 57.5 km short-spacing to another allocation for

the same channel at the same Trois-Rivieres, Quebec. Both allocations bear the notation "Special Negotiated Short-spacing Allotment." A third is an apparent 42 km short-spacing to a yet another Canadian proposal to add channel 234C1 at Vianney, Quebec. This PRM bears the notated restriction of "38.5kw/186.5m HAAT."

In any event, using a directional antenna, there is no predicted interference from the proposed Chateaugay substitution to either of the two Trois-Rivieres allocations or to the Vianney proposal (Exhibit B-3).

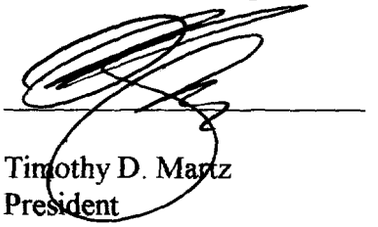
Petitioner does wish to point out that the Vianney proposal is mutually exclusive to Canada's two unused and unapplied for mutually exclusive allocations on channel 234C1 at Trois-Rivieres, Quebec. Once again, this proposal could not possibly by effectuated without a reduction or deletion of both of the the unused or unapplied for channel 234C1 allocation at Trois-Rivieres since the two Canadian co-channel C1 sites are only 77 km apart.

Significant land area is available on which a facility could be located to meet all FCC mileage separation requirements and U.S./Canada Working Agreement interference criteria to pertinent facilities, authorizations, applications and assignments, as well as place the requisite 70dBu service over all of Chateaugay, the community of license of Station WEEP-FM.

3. Petitioner is a Delaware corporation and is owned and controlled by citizens of the United States. If the petition is acted upon favorably, the channel substitution made at Chateaugay and the construction permit of Station WEEP-FM modified as requested, Petitioner will promptly apply for authorization to construct the improved facilities of the station.

Respectfully submitted,

Vector Broadcasting Inc.



Timothy D. Martz
President

Dated: 2/19/93

EXHIBIT A

FM Spacing study

Title: WEEP U GRADE TO C2
Channel 234C2 (94.7 MHz)
Database: DW 11/02/92

Latitude: 44-49-41
Longitude: 73-58-43
Safety zone: 100 km

Call / City of License	Auth	Licensee name / St FCC File no.	Chan / Freq	ERP-kW / EAH-m	Latitude / Longitude	Br-to / -from	Dist. (km)	Req. (km)
ALLOC			231A		43-42-42	212.9	147.3	55
OLD FORGE		NY	94.1		74-58-24	32.2	92.30	CLEAR
Filing window 12/13-01/12/89 **CLOSED** ; ALLOC REOPENS PER CP CANCELLATION								
CKMF-FM	LIC	RADIODIFFUSION MUTUELLE	232C1	41	45-30-20	21.8	81.19	115
MONTREAL		QU	94.3	299	73-35-32	202.0	-33.8	SHORT
WYOY	ORD	EDWARD G & CAROLE L PICK	233C3		43-46-42	144.1	143.5	117
RUTLAND		VT	94.5		72-55-49	324.8	26.54	CLEAR
DOC-89-518; ORDERED FROM 233A; Was WHWB-FM 04/15/91 per FCC release #156 dated 04/19/91								
WYOY	LIC	EDWARD G & CAROLE L PICK	233A	3	43-36-49	150.3	154.9	106
RUTLAND		VT BLH-890504KA	94.5	-72	73-01-33	331.0	48.94	CLEAR
Deletion proposed; ORDERED TO 233C3; Was WHWB-FM 04/15/91 per FCC release #156 dated 04/19/91								
CITE2	LIC		233D	.05	45-23-27	68.3	175.5	
SHERBROOKE		QU	94.5	28	71-53-44	249.8		
LOW POWER								
WEEP-FM	CP	VECTOR BROADCASTING INCO	234A	.85	44-49-41	.0		166
CHATEAUGAY		NY BPH-900518MN	94.7	186	73-58-43	.0	-166	SHORT
CP Granted 12/23/91 per FCC release #21285 dated 12/27/91; Was WXEB 04/01/92 per FCC release #180 dated 04/10/92								
WBAR-FM	LIC	BULMER COMM. OF GLENS FA	234A	.30	43-17-22	173.6	172.0	166
LAKE LUZERNE		NY BLH-920623KA	94.7	272	73-44-35	353.8	5.998	CLOSE
License Granted 09/15/92 per FCC release #21470 dated 09/18/92; Was WZBR 11/01/90 per FCC release #146 dated 11/02/90; Ant: Elec. Res. Inc. 1105-A								
WMHI	LIC	MARS HILL BROADCASTING C	234A	3	44-04-42	246.1	199.8	166
CAPE VINCENT		NY BMLED-911112K	94.7	100	76-15-37	64.5	33.81	CLEAR
License Granted 12/20/91 per FCC release #21285 dated 12/27/91; Call Granted 12/07/89								
ALLOC			234C1		46-21-00	32.8	202.6	271
THREE RIVERS		QU	94.7		72-33-00	213.8	-68.4	SHORT
WMAS-FM	LIC	LAPPIN COMMUNICATIONS IN	234B	50	42-06-32	159.5	321.7	241
SPRINGFIELD		MA BLH-801010AD	94.7	59	72-36-44	340.4	80.70	CLEAR
Affiliated with WMAS(AM)								
CIMF-FM	LIC	TELEMEDIA COMMUNICATIONS	235C1	84	45-30-11	297.7	165.2	195
HULL		QU	94.9	323	75-51-02	116.4	-29.8	SHORT

FM Spacing study

Title: WEEP U GRADE TO C2
Channel 234C2 (94.7 MHz)

Latitude: 44-49-41
Longitude: 73-58-43

Call / City of License	Auth	Licensee name / St	FCC File no.	Chan / Freq	ERP-kW / EAH-m	Latitude / Longitude	Br-to / -from	Dist. (km)	Req. (km)
WKLL	LIC	RAVINE BROADCASTING INCO		235B	50	43-03-26	205.4	217.2	169
FRANKFORT		NY	BLH-900208KC	94.9	84	75-07-24	24.6	48.16	CLEAR
License Granted 09/20/90 per FCC release #20957 dated 09/26/90; Call Granted 12/15/89 per FCC release #125 dated 01/12/90									
WHOM	APP	NORTHLAND BROADCASTING,		235C	50	44-16-12	105.4	221.4	188
MOUNT WASHINGTON		NH	BPH-920603II	94.9	1141BT	71-18-15	287.3	33.39	CLEAR
Received per FCC release #15285 dated 06/15/92, accepted per 15287 dated 06/17/92									
WHOM	LIC	NORTHLAND BROADCASTING I		235C	48	44-16-13	105.4	221.4	188
MOUNT WASHINGTON		NH		94.9	1146	71-18-13	287.2	33.42	CLEAR
CHWY-FM	APP			236B	18.5	45-29-54	23.0	81.08	94
MONTREAL		QU		95.1	188	73-34-17	203.3	-12.9	SHORT
ALLOC				236B		45-30-20	21.8	81.19	94
MONTREAL		QU		95.1		73-35-32	202.0	-12.8	SHORT
CFRF-FM	APP			236B	12.5	45-30-20	21.8	81.19	94
MONTREAL		QU		95.1	299	73-35-32	202.0	-12.8	SHORT
CHYC-FM	APP			236B	8	45-30-20	21.8	81.19	94
MONTREAL		QU		95.1	227	73-35-32	202.0	-12.8	SHORT
CKTZ-FM	APP			236B	23	45-30-20	21.8	81.19	94
MONTREAL		QU		95.1	221	73-35-32	202.0	-12.8	SHORT
NEW	APP			236B	23	45-30-20	21.8	81.19	94
MONTREAL		QU		95.1	223	73-35-32	202.0	-12.8	SHORT
NEW	APP			236B	50	45-31-06	22.6	83.23	94
MONTREAL		QU		95.1	130	73-34-04	202.9	-10.8	SHORT
NEW	APP			236B	50	45-38-58	12.7	93.61	94
MONTREAL		QU		95.1	120	73-42-53	192.8	-.39	SHORT
NEW	APP			236B	50	45-38-58	12.7	93.61	94
MONTREAL		QU		95.1	128	73-42-53	192.8	-.39	SHORT
CIFI-FM	APP			236B	1.45	45-35-14	27.5	95.39	94
MONTREAL		QU		95.1	60	73-24-43	207.9	1.394	CLOSE
WXXX	LIC	JAMES BROADCASTING COMPA		237A	3	44-30-35	119.1	72.21	55
SOUTH BURLINGTON		VT	BLH-841126KW	95.3	69	73-11-05	299.7	17.21	CLEAR
Deletion proposed; ORDERED TO 238C3									

FM Spacing study

Title: WEEP U GRADE TO C2
Channel 234C2 (94.7 MHz)

Latitude: 44-49-41
Longitude: 73-58-43

Call / City of License	Auth / St	Licensee name / FCC File no.	Chan / Freq	ERP-kW / EAH-m	Latitude / Longitude	Br-to -from	Dist. (km)	Req. (km)
WGIX-FM	LIC	RGR BCG OF GOUVERNEUR IN	237A	37	44-19-47	245.2	129.7	55
GOUVERNEUR	NY	BLH-810313AK	95.3	37	75-27-20	64.1	74.72	CLEAR
Was WIGS-FM 07/01/88; Affiliated with WIGS(AM)								
NEW	CP	KILLINGTON BROADCASTING	287C2	1.20	43-36-18	145.4	164.4	20
KILLINGTON	VT	BPH-851030MN	105.3	784	72-49-14	326.2	144.4	CLEAR
DOC-88-240; Amended 03/17/88; CP Granted 07/09/91 per FCC release #DC-1913 dated 07/25/91								
WLPW	LIC	ADIRONDACK NETWORK SYSTE	288A	3DA	44-15-36	183.2	63.22	15
LAKE PLACID	NY	BLH-800104AB	105.5	-71	74-01-22	3.2	48.22	CLEAR
Affiliated with WIRD(AM)								

>> End of channel 234C2 study <<

FM Spacing study

Title: WEEP U GRADE TO C2
Channel 234C2 (94.7 MHz)
Database: FCC 09/28/92

Latitude: 44-49-41
Longitude: 73-58-43
Safety zone: 100 km

Call / City of License	Auth	Licensee name / St FCC File no.	Chan / Freq	ERP-kW / EAH-m	Latitude / Longitude	Br-to -from	Dist. (km)	Req. (km)
WUMA Old Forge	CP	Ross Broadcasting Compan NY BPH-890113ME	231A 94.1	3 100	43-43-17 74-56-28	212.2 31.6	145.0 90.00	55 CLEAR
Class B1 with respect to Canada								
ALLOC Old Forge		 NY DOC-88-130	231A 94.1		43-42-42 74-58-24	212.9 32.2	147.3 92.30	55 CLEAR
Filing window 12/13-01/12/89 **CLOSED** ; Class B1 with respect to Canada; Effective 12-12-88								
ALLOC Whitehall		 NY DOC-84-231	231A 94.1		43-33-00 73-24-18	162.0 342.4	149.2 94.23	55 CLEAR
Filing window 08/31-10/08/87 **CLOSED** ; # 33								
CKMF-FM Montreal		 QU	232C1 94.3	41 299	45-30-20 73-35-32	21.8 202.0	81.19 -33.8	115 SHORT
ALLOC Rutland		 VT DOC-89-518	233C3 94.5		43-46-42 72-55-49	144.1 324.8	143.5 26.54	117 CLEAR
Class B1 with respect to Canada-Accepted by Canada 901108 Site Restricted-Effective 10-22-90-Reserved for WKLZ per D89-518								
WYOY Rutland	LIC	E.G. Pickett and Carole VT BLH-890504KA	233A 94.5	3 -72	43-36-49 73-01-33	150.3 331.0	154.9 48.94	106 CLEAR
DOC-88-10; *To amend to channel 233C3 per D89-518 Class B1 with respect to Canada-Accepted by Canada 901108								
WEEP-FM Chateaugay	CP	Vector Broadcasting Inc. NY BPH-900518MN	234A 94.7	.85 186	44-49-41 73-58-43	.0 .0	 -166	166 SHORT
ALLOC Chateaugay		 NY DOC-89-101	234A 94.7		44-54-57 74-04-50	320.6 140.5	12.65 -153	166 SHORT
Filing window 04/24-05/24/90 **CLOSED** ; Site Restricted-Effective 4-23-90								
ALLOC Lake Luzerne		 NY DOC-87-199	234A 94.7		43-18-46 73-50-07	176.1 356.2	168.8 2.759	166 CLOSE
Filing window 01/20-02/19/88 **CLOSED** ; EFFECTIVE 1-19-88								
WBAR-FM Lake Luzerne	LIC	Bulmer Communications of NY BLH-920623KA	234A 94.7	.30 272	43-17-22 73-44-35	173.6 353.8	172.0 5.998	166 CLOSE
WMHI Cape Vincent	LIC	Mars Hill B/Cting Compan * NY BMLED-911112K	234A 94.7	3 100	44-04-42 76-15-37	246.1 64.5	199.8 33.81	166 CLEAR
Commercial Channel Operating Educational								
ALLOC Trois-Rivieres		 QU	234C1 94.7		46-21-00 72-33-00	32.8 213.8	202.6 -68.4	271 SHORT
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION								

FM Spacing study

Title: WEEP U GRADE TO C2
Channel 234C2 (94.7 MHz)

Latitude: 44-49-41
Longitude: 73-58-43

Call / City of License	Auth / St	Licensee name / FCC File no.	Chan / Freq	ERP-kW / EAH-m	Latitude / Longitude	Br-to -from	Dist. (km)	Req. (km)
ALLOC			234A		44-07-30	248.2	203.2	166
Cape Vincent	NY		94.7		76-20-12	66.5	37.23	CLEAR
Filing window 04/05-05/05/88 **CLOSED** ; SNS-S ALC-EFFECTIVE DATE 4-4-88								
ALLOC			234C1		46-30-10	28.8	213.5	271
Trois-Rivieres	QU		94.7		72-38-15	209.7	-57.5	SHORT
Specially negotiated short spaced allotment								
PRM			234C1		46-03-28	52.4	228.7	271
Vianney	QU		94.7		71-38-06	234.0	-42.3	SHORT
SPEC NEG S/S ALLOT ERP LTD TO 38.5KW/HAAT 186.5M TO WHOMFM								
ALLOC			234B		42-06-32	159.5	321.7	241
Springfield	MA		94.7		72-36-44	340.4	80.70	CLEAR
Coordinates updated from LIC record			BLH801010AD					
WMAS-FM LIC		Lappin Communications, I	234B	50	42-06-32	159.5	321.7	241
Springfield	MA	BLH-801010AD	94.7	59	72-36-44	340.4	80.70	CLEAR
CIMF-FM			235C1	84	45-30-11	297.7	165.2	195
Hull	QU		94.9	323	75-51-02	116.4	-29.8	SHORT
WKLL LIC		Ravine Broadcasting, Inc	235B	50	43-03-26	205.4	217.2	169
Frankfort	NY	BLH-900208KC	94.9	84	75-07-24	24.6	48.16	CLEAR
ALLOC			235B		43-02-41	206.8	221.2	169
Frankfort	NY	DOC-84-894	94.9		75-12-15	25.9	52.24	CLEAR
Filing window 11/05-12/05/85 **CLOSED** ; SITE RESTRICTED - EFFECTIVE 11-4-85								
WHOM APC		Northland Broadcasting,	235C	50	44-16-12	105.4	221.4	188
Mount Washington	NH	BPH-920603II	94.9	1141BT	71-18-15	287.3	33.39	CLEAR
Engineering as shown on app; agreement Erp/Haat combination exceeds the maximu m value for the international								
WHOM LIC		Northland Broadcasting,	235C	48	44-16-13	105.4	221.4	188
Mount Washington	NH	BLH-4734	94.9	1146	71-18-13	287.2	33.42	CLEAR
GRANDFATHERED AT 48 KW @ 1146 M HAAT.								
ALLOC			235C		44-16-13	105.4	221.4	188
Mount Washington	NH		94.9		71-18-13	287.2	33.42	CLEAR
Coordinates updated from LIC record			BLH4734					
CHWY-FM			236B	18.5	45-29-54	23.0	81.08	94
Montreal	QU		95.1	188	73-34-17	203.3	-12.9	SHORT
SPECIAL NEGOTIATED SHORT SPACED ALLOCATION								
ALLOC			236B		45-30-20	21.8	81.19	94
Montreal	QU		95.1		73-35-32	202.0	-12.8	SHORT
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION								

FM Spacing study

Title: WEEP U GRADE TO C2
Channel 234C2 (94.7 MHz)

Latitude: 44-49-41
Longitude: 73-58-43

Call / City of License	Auth / St	Licensee name / FCC File no.	Chan / Freq	ERP-kW / EAH-m	Latitude / Longitude	Br-to -from	Dist. (km)	Req. (km)
CFRF-FM			236B	12.5	45-30-20	21.8	81.19	94
Montreal	QU		95.1	299	73-35-32	202.0	-12.8	SHORT
SPECIAL NEGOTIATED SHORT SPACED ALLOCATION								
CHYC-FM			236B	8	45-30-20	21.8	81.19	94
Montreal	QU		95.1	227	73-35-32	202.0	-12.8	SHORT
CKTZ-FM			236B	23	45-30-20	21.8	81.19	94
Montreal	QU		95.1	221	73-35-32	202.0	-12.8	SHORT
NEW			236B	23	45-30-20	21.8	81.19	94
Montreal	QU		95.1	223	73-35-32	202.0	-12.8	SHORT
NEW			236B	50	45-31-06	22.6	83.23	94
Montreal	QU		95.1	130	73-34-04	202.9	-10.8	SHORT
SPECIAL NEGOTIATED SHORT SPACED ALLOCATION								
NEW			236B	50	45-38-58	12.7	93.61	94
Montreal	QU		95.1	120	73-42-53	192.8	-.39	SHORT
NEW			236B	50	45-38-58	12.7	93.61	94
Montreal	QU		95.1	128	73-42-53	192.8	-.39	SHORT
SPECIAL NEGOTIATED SHORT SPACED ALLOCATION								
CIFI-FM			236B	1.45	45-35-14	27.5	95.39	94
Montreal	QU		95.1	60	73-24-43	207.9	1.394	CLOSE
WXXX LIC		James Broadcasting Compa	237A	3	44-30-35	119.1	72.21	55
South Burlington	VT	BLH-841126KW	95.3	69	73-11-05	299.7	17.21	CLEAR
DOC-81-297; *To channel 238C3 Per D91-29								
ALLOC			237A		44-19-47	245.2	129.7	55
Gouverneur	NY		95.3		75-27-20	64.1	74.72	CLEAR
Coordinates updated from LIC record			BLH810313AK					
WGIX-FM LIC		RGR Broadcasting of Gouv	237A	3	44-19-47	245.2	129.7	55
Gouverneur	NY	BLH-810313AK	95.3	37	75-27-20	64.1	74.72	CLEAR
ALLOC			287C2		43-39-53	143.0	161.1	20
Killington	VT		105.3		72-46-30	323.9	141.1	CLEAR
Filing window 09/30-10/30/85 **CLOSED** ; EFFECTIVE 9-27-85								
WLPW LIC		Wird, Inc.	288A	3	44-15-36	183.2	63.22	15
Lake Placid	NY	BLH-800104AB	105.5	-71	74-01-22	3.2	48.22	CLEAR
DOC-78-257								
ALLOC			288A		44-15-36	183.2	63.22	15
Lake Placid	NY		105.5		74-01-22	3.2	48.22	CLEAR
Coordinates updated from LIC record			BLH800104AB					

EXHIBIT B-1

INTERFERENCE STUDY OF CHANNEL 232C1, CKMF MONTREAL, QUEBEC & ALLOCATION & APPLICATIONS FOR 236B, MONTREAL, QUEBEC

CKMF - CHANNEL 232C1

The CKMF F (50,50) 54 dbu contour was assumed as a full Class C1 facility, 100kw at 300 meters, with a protected contour set at 86 km. This is a conservative and worst-case assumption, as it is important to note that, like all 8 Montreal Class C1 facilities, CKMF operates far below maximum Class C1 parameters. With an ERP of only 41 kw at 299 meters, the F(50,50) curves indicate a protected contour of only 77 km.

CHANNEL 236B

The allocation for Channel 236B in Montreal, Quebec was assumed to be a full Class B. The maximum protected F(50,50) 54 dbu contour of 65 km was assumed. This assumption is clearly a worst-case scenario. Although currently under active application, we have selected the coordinates closest to our site in our interference study. In addition, a review of the technical parameters of the 9 applications shows that none of the proposed facilities would operate at full Class B power and height.

PROPOSED CHANNEL 234C2 INTERFERENCE

As second adjacent channel, the interfering F(50,10) 74 dbu contour of the proposed Chateaugay substitution was calculated from the propogation curves at approximately 28 km. The tower site specified in our construction permit is 19.1 km south of the U.S./Canadian border. However, since protection is afforded the Canadian channels only to the U.S./Canadian border and not beyond, a site restriction of

28 km south of the U.S./Canadian border (or 9 km south of our tower site coordinates) would not result in any interference to the protected Canadian signals of either CKMF (Channel 232C1), Montreal or to the allocation & applications for Channel 236B in Montreal. Similarily, from site coordinates specified in our construction permit, a directional reduction of 6.7 dbu in the direction of Montreal would reduced interfering propogation contours to 19.1 km, the exact distance to the U.S./Canadian border. (See Map Exhibit B-1).

CONCLUSION

With a site restriction, no interference to CKMF's Canadian signal would result from the substitution of Channel 234C2 for Channel 234A at Chateaugay. Using a directional antenna from the coordinates specified in our construction permit, no interference to CKMF's Canadian signal would result from the substitution of Channel 234C2 for Channel 234A at Chateaugay.

Similarly, no interference to the Canadian signal of Channel 236B (Montreal) would result from the substitution of Channel 234C2 for Channel 234A at Chateaugay. (See Exhibit B-1)

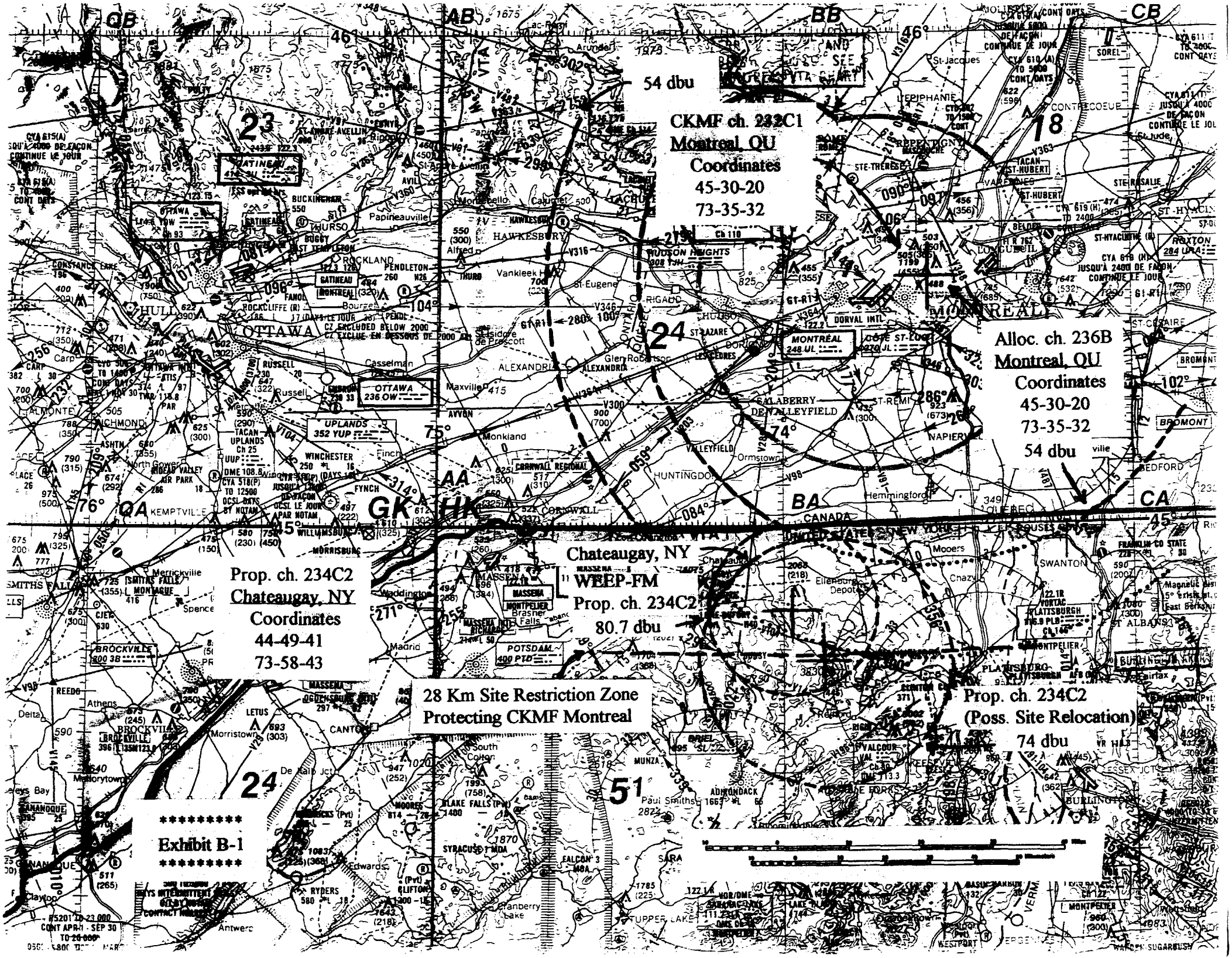

54 dbu
CKMF ch. 232C1
Montreal, QU
Coordinates
45-30-20
73-35-32
Alloc. ch. 236B
Montreal, QU
Coordinates
45-30-20
73-35-32
54 dbu
Chateaugay, NY
WEEP-FM
Prop. ch. 234C2
80.7 dbu
Prop. ch. 234C2
Chateaugay, NY
Coordinates
44-49-41
73-58-43
28 Km Site Restriction Zone
Protecting CKMF Montreal
Prop. ch. 234C2
(Poss. Site Relocation)
74 dbu
Exhibit B-1
OTTAWA
MONTREAL
HULL
GATINEAU
CANADA
UNITED STATES-NEW YORK

EXHIBIT B-2

INTERFERENCE STUDY OF CHANNEL 235C1, CIMF, HULL, QUEBEC

CIMF - CHANNEL 235C1

The CIMF F(50,50) 54 dbu contour was assumed as a full Class C1 facility, 100 kw at 300 meters, with a protected contour set at 86 km.

PROPOSED CHANNEL 234C2 INTERFERENCE

As a first adjacent channel, the interfering F(50,10) 48 dbu contour of the proposed Chateaugay was calculated from the propogation curves at approximately 99 km. From the site coordinates specified in our construction permit, a directional reduction of 5.8 dbu in our signal in the direction of Hull would reduce our interfering propogation curves to 79 km.

CONCLUSION

Combining the protected CIMF contour distance of 86 km to the interfering contour of the proposed Chateaugay facility of 99 km produces a required 185 km separation. With an actual separation of 165 km between the CIMF site and the coordinates specified our construction permit, there is an apparent 20 km short-spacing. With a 5.8 dbu directional reduction in power, the short-spacing is eliminated. Moving our tower would minimize the directional power reduction.

Therefore, with either a site restriction and/or use of a directional antenna in the direction of Hull, no interference to CIMF's Canadian signal would result from the substitution of Channel 234C2 for Channel 234A at Chateaugay. (See Exhibit B-2)

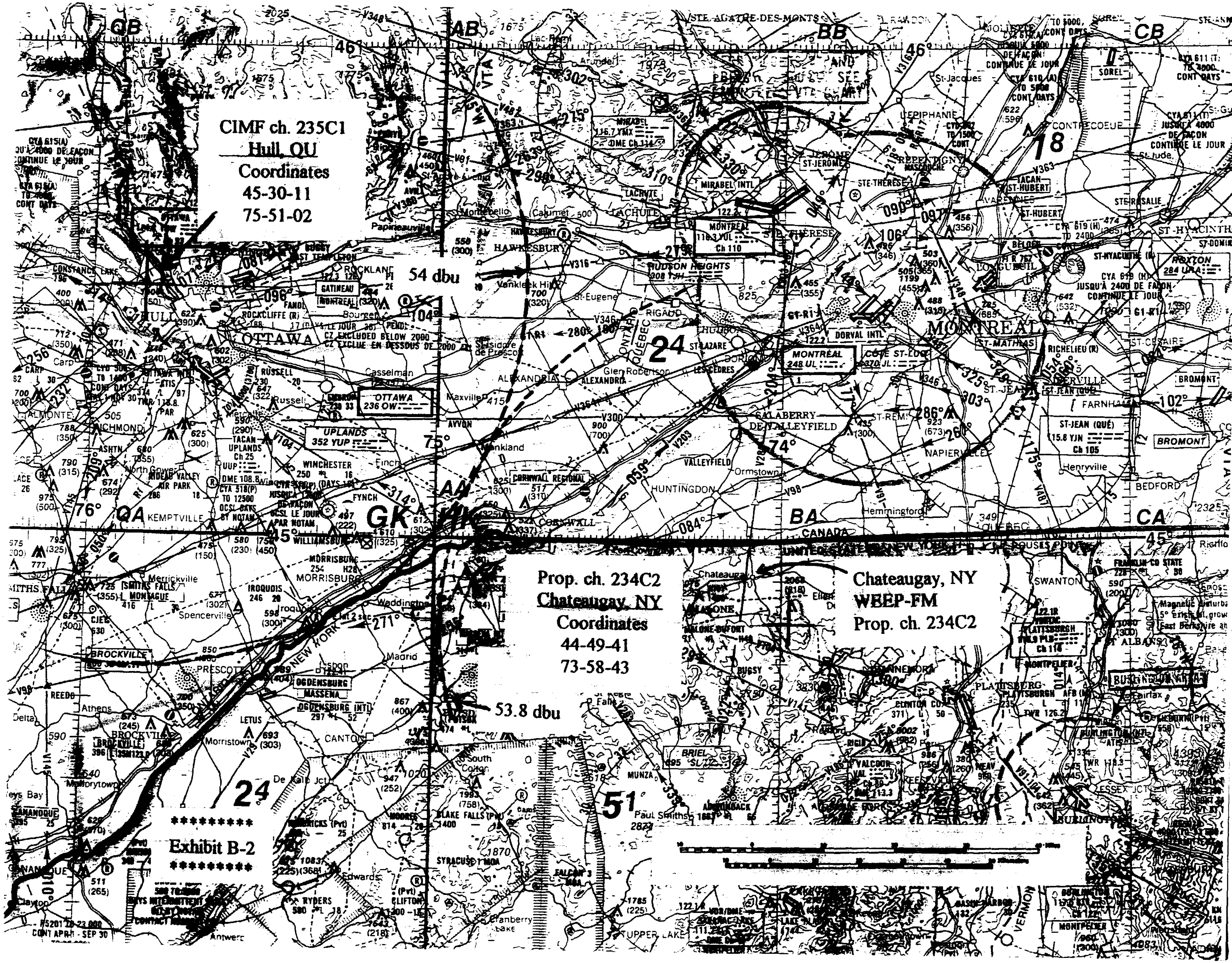

CIMF ch. 235C1
Hull, QU
Coordinates
45-30-11
75-51-02
54 dbu
Prop. ch. 234C2
Chateaugay, NY
Coordinates
44-49-41
73-58-43
Chateaugay, NY
WEEP-FM
Prop. ch. 234C2
53.8 dbu
****
Exhibit B-2
****
OTTAWA
MONTREAL
HAWKESBURY
CORNWALL
CANADA
UNITED STATES
NEW YORK

EXHIBIT B-3

INTERFERENCE STUDY OF UNUSED AND UNAPPLIED FOR TWO MUTUALLY EXCLUSIVE ALLOCATIONS ON CHANNEL 234C1, TROIS-RIVIERES , QUEBEC

UNUSED & UNAPPLIED FOR ALLOCATIONS ON CHANNEL 234C1

Only one of these allocations could possibly be utilized. Furthermore, it should be noted that Canada's proposal to add the same channel to a community 77 km to the southeast would make this Canadian allocation technically impossible. Nevertheless, in a clearly worst case scenario, the F(50,50) 54 dbu contour of the closest unused and unapplied for Trois-Rivieres allocation was assumed as a full Class C1 facility, 100kw at 300 meters, with a protected contour set at 86 km.

PROPOSED CHANNEL 234C2 INTERFERENCE

As a co-channel, the interfering F(50,10) 34 dbu contour of the proposed Chateaugay facility was calculated from the propogation curves at approximately 172 km. From the site coordinates specified in our construction permit, a directional reduction of 10 dbu in our signal in the direction of Trois-Rivieres would reduce our interfering propogation curves to 117 km. Use of the second Trois-Rivieres allocation would require a directional power reduction of only 8 dbu, reducing our interfering propogation curves to 128 km.

CONCLUSION

Combining the protected Channel 234C1 Trois Rivieres contour distance of 86 km to the interfering contour of the proposed Chateaugay facility of 172 km produces a required 258 km separation. With an actual separation of 203 kilometers between

the Trois-Rivieres allocation coordinates and the site coordinates specified in our construction permit, there is an apparent 55 km short-spacing. With a 10 dbu directional reduction in power (8 dbu with the second Trois-Rivieres allocation), the short-spacing is eliminated. In either case, moving our tower would minimize the directional power reduction.

Therefore, with the use of a directional antenna in the direction of Trois-Rivieres, no interference to each of the Canadian allotments would result from the substitution of Channel 234C2 for Channel 234A at Chateaugay. (See Exhibit B-3)

In addition, the "special negotiated short-spacing" status attached to the Trois-Rivieres allocations could afford less reduction of directional power.

INTERFERENCE STUDY OF CANADIAN PROPOSAL TO ADD CHANNEL 234C1, VIANNEY, QUEBEC

CHANNEL 234C1 PROPOSAL

Canada's proposal to add this channel to a community 77 km to the southeast of its own two co-channel 234C1 allocations in Trois-Rivieres would make this Canadian allocation technically impossible. In spite of the stated maximum ERP of 38.5 kw, in a clearly worst case scenario, the F(50,50) 54 dbu contour of this proposed addition was assumed as a full Class C1 facility, 100 kw at 300 meters, with a protected contour set at 86 km.

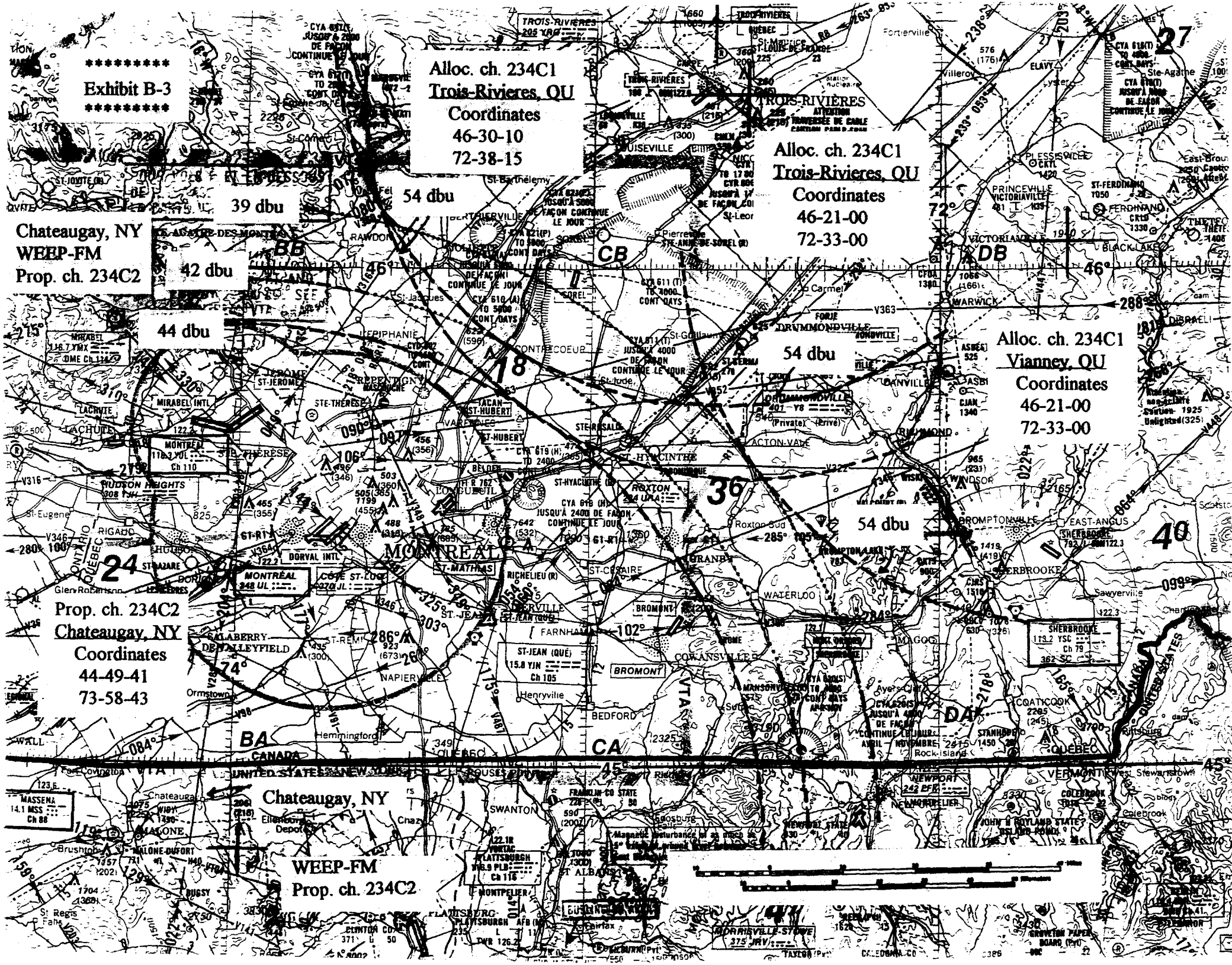
PROPOSED CHANNEL 234A INTERFERENCE

As a co-channel, the interfering F(50,10) 34 dbu contour of the proposed Chateaugay facility was calculated from the propogation curves at approximately 172 km. From the site coordinates specified in our construction permit, a directional reduction of 5 dbu in our signal in the direction of Vianney would reduce our interfering propogation curves to 143 km.

CONCLUSION

Combining the protected Channel 234C1 Vianney contour distance of 86 km to the interfering contour of the proposed Chateaugay facility of 172 km produces a required 258 kilometer separation. With an actual separation of 229 km between the Vianney proposal coordinates and the site coordinates specified in our construction permit, there is an apparent 29 km short-spacing. With a 5 dbu directional reduction in power, the short-spacing is eliminated. In this case again, moving our tower would minimize the directional power reduction.

Therefore, with the use of a directional antenna in the direction of Vianney, no interference to Canadian allotment would result from the substitution of Channel 234C2 for Channel 234A at Chateaugay. (See Exhibit B-3)


****
Exhibit B-3
****
Alloc. ch. 234C1
Trois-Rivieres, QU
Coordinates
46-30-10
72-38-15
Alloc. ch. 234C1
Trois-Rivieres, QU
Coordinates
46-21-00
72-33-00
Alloc. ch. 234C1
Vianney, QU
Coordinates
46-21-00
72-33-00
Chateaugay, NY
WEEP-FM
Prop. ch. 234C2
Prop. ch. 234C2
Chateaugay, NY
Coordinates
44-49-41
73-58-43
WEEP-FM
Prop. ch. 234C2
39 dbu
42 dbu
44 dbu
54 dbu
54 dbu
54 dbu
MONTREAL
TROIS-RIVIERES
Chateaugay, NY
CANADA
UNITED STATES-NEW YORK
QUEBEC
VERMONT